

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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| In the Matter of the Petition of |) | |
| |) | Docket No. UE-20_____ |
| Avista Corporation, d/b/a Avista Utilities |) | |
| |) | PETITION OF AVISTA |
| For an Order Approving a Service Territory |) | CORPORATION |
| Agreement Between Avista Corporation and |) | |
| <u>Inland Power and Light Company.</u> |) | |

I. INTRODUCTION

1 In accordance with RCW 54.48.030, Avista Corporation, doing business as Avista Utilities ("Avista" or "Company"), at 1411 East Mission Avenue, Spokane, Washington, respectfully requests that the Commission approve the enclosed Electric Service Letter of Agreement (Exhibit A) with Inland Power and Light Company ("Inland Power").

2 Avista Utilities serves approximately 388,000 electric and 355,000 natural gas customers in a 30,000 square mile service territory covering portions of Washington, Idaho and Oregon. The largest community served by Avista is Spokane, Washington, which is the location of its corporate headquarters.

Please direct all correspondence related to this Petition as follows:

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3 Statutes that may be brought at issue in this Petition include RCW 54.48.020 and RCW
54.48.030.

4 RCW 54.48.020 states that the “legislature hereby declares that the duplication of the
electric lines and service of public utilities and cooperatives is uneconomical, may create
unnecessary hazards to the public safety, discourages investment in permanent underground
facilities, and is unattractive, and thus is contrary to the public interest and further declares that
it is in the public interest for public utilities and cooperatives to enter into agreements for the
purpose of avoiding or eliminating such duplication.”

II. BACKGROUND

5 Avista’s single phase overhead line extends approximately 2200 feet through a backyard
easement of developed small lots served by Inland Power. The overhead line provides electric
service to one customer located at an address on South Dishman Mica Rd. Within the same
backyard easement, Inland Power has an overhead single phase line which provides service to
all the developed small lots from South Bowdish to South Pierce St. Inland Power intends on
rebuilding this overhead line as part of their system improvement program. The proximity of
these lines, among other things, can create safety issues for both Inland Power and Avista,
especially in times of outage.

6 The Electric Service Letter of Agreement states that in 2018, Inland Power approached
Avista about transferring the service to the Premises from Avista to Inland Power. Inland Power
planned to rebuild its overhead line as part of its system improvement program and, as part of
that project, it could connect and serve the Premises. Due to the safety concerns associated with
having two overhead lines in close proximity in the same easement, Avista agreed to transition

the service to the Premises from Avista to Inland Power subject to the terms of the Electric Service Letter of Agreement (Exhibit A) and Commission approval. Importantly that agreement has also been acknowledged by the Customer.

III. SUMMARY

7 Avista is allowing Inland Power to serve the Premises due to the unique circumstances that exist and, in particular, the safety concerns associated with the proximity of Avista's and Inland Power's overhead lines as discussed above. Avista's agreement to allow Inland Power to serve the Premises is not intended to, and shall not, be used as precedent for the provision of service to any other current or potential Avista customer.

IV. REQUEST FOR RELIEF

8 WHEREFORE, as described herein and set forth in the proposed Agreement, the Company respectfully requests that the Commission issue an order approving the Agreement, as required under RCW 54.48.030.

DATED this 1st day of April 2020

By: /s/ Patrick Ehrbar
Patrick D. Ehrbar
Director of Regulatory Affairs